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*Interim Lead Class Counsel in Cameron, et. al  
v. Apple Inc., Case No. 4:19-cv-03074-YGR*

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION

IN RE APPLE IPHONE ANTITRUST  
LITIGATION

No. 4:11-cv-06714-YGR (TSH)

**PLAINTIFFS' RESPONSE TO  
DEFENDANT APPLE INC.'S  
ADMINISTRATIVE MOTION TO SEAL  
PORTION OF TRANSCRIPT**

DONALD R. CAMERON, et al.,

No. 4:19-cv-03074-YGR (TSH)

Plaintiffs,

v.

APPLE INC.

Defendant.

Developer Plaintiffs (“Plaintiffs”) respectfully submit this Response to Defendant Apple Inc.’s Administrative Motion to Seal Portion of Transcript.<sup>1</sup> In the Administrative Motion, Apple seeks to redact a statement made by Plaintiffs’ counsel at lines 19 through 21 on page 79 of the transcript of the hearing held before the Court on December 15, 2020, on the basis that the redaction is necessary “to protect Apple’s confidential trade secrets and to remedy a partial violation of the Protective Order.”<sup>2</sup> Plaintiffs believe the factual information at these lines has been publicly reported.<sup>3</sup> We understand that Apple takes a different view. To avoid unnecessary disputes, and in good faith, Plaintiffs do not oppose redaction of lines 19 through 21 on page 79 of the transcript of the December 15, 2020 hearing, or the other sealing requests made by Apple on page 2 of its Administrative Motion.

DATED: December 28, 2020

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By /s/ Steve W. Berman  
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<sup>1</sup> See Defendant Apple Inc.’s Administrative Motion to Seal Portion of Transcript, *Cameron et al. v. Apple Inc.*, No. 4:19-cv-03074-YGR (N.D. Cal. Dec. 24, 2020), ECF No. 211.

<sup>2</sup> *Id.* at 1:4-5.

<sup>3</sup> See *id.*, Dettmer Decl., Ex. B at n. 1.